

REMARKS

Claims 32-70 are pending in the application. Claims 32, 34, 44 and 46 have been amended herein to recite the invention further. Claims 56-70 are newly added. Support for claims 56-70 can be found throughout the initial disclosure. For example, support for claims 56 and 57 can be found in paragraph [0024] at page 5 of the specification, support for claims 58 and 59 can be found in paragraph [0064] at pages 18 and 19 of the specification. Support for claims 60-70 can be found throughout the detailed description.

Claim Rejections – 35 USC § 102

Claims 32-40, 42-52 and 54-55 were rejected under 35 U.S.C. § 102(b) as being anticipated by Mortimer et al. (U.S. Patent No. 6,091,930). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 32 and 44 have been amended to further recite “wherein the at least one modification is automatically categorized or manually categorized.”

Support for these amendments can be found throughout the initial disclosure. For example, the Examiner attention is directed to paragraph [0054] at page 15 of the specification.

Contrary to Examiner’s contention, Mortimer et al. does not disclose an automatic mode where the at least one modification is automatically categorized or a manual mode where data is received from a user that identifies a category with which the at least one modification is correlated. At col. 7, lines 27-31, Mortimer et al. merely discloses that students can add notes in a margin of a presented material and a note module stores and links the added notes to the presented text such that the notes appear with the presented text. Mortimer et al. does not disclose, teach or suggest that modifications or notes made or added to the text are automatically or manually categorized. Mortimer et al. discloses categorizing and organizing a topic into an appropriate chapter for the subject matter (see col. 8, lines 52-54). However, Mortimer et al. is completely silent about categorizing a modification made to the text of a subject matter.

Therefore, Mortimer et al. does not disclose, teach or suggest “wherein the at least one modification is automatically categorized or manually categorized,” as recited in claim 32 and 44.

Therefore, Applicant respectfully submits that claims 32 and 44, and claims 33-40, 42, 43, 45-52, 54 and 55 which depend from either claim 32 or claim 44, are patentable.

Furthermore, claims 34 and 46 which depend from claims 32 and 44, respectively, are further patentable for the subject matter recited therein. Indeed, Mortimer et al. does not disclose, teach or suggest “the at least one modification is manually categorized by receiving data from a user that identifies a category with which the at least one modification is correlated,” as recited in claims 34 and 46.

Moreover, contrary to Examiner’s contention, Mortimer et al. does not disclose, teach or suggest “the storage medium includes a plurality of documents and a plurality of modifications stored thereon,” as recited in claims 35 and 47. Indeed, Mortimer et al. is merely using one text (one textbook), i.e. one document and Mortimer et al. simply makes modifications to the one textbook CITbook (see abstract in Mortimer et al.). Applicant submits that the presented text, i.e. the CITbook textbook in Mortimer et al. is only one document (one knowledge base) and is not equivalent to a plurality of documents.

Therefore, for at least these reasons, Applicant respectfully requests that the rejection of claims 32-40, 42-52 and 54-55 under § 102(b) over Mortimer et al. be withdrawn.

Claim Rejections – 35 USC § 103

Claims 41 and 53 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Mortimer et al. in view of Takeda et al. (U.S. Patent No. 5,349,368). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 41 and 53 depend from, respectively, claims 32 and 44. Therefore, for at least the reasons provided above with respect to claims 32 and 44, Applicant respectfully submits that claims 41 and 53 are patentable over Mortimer et al.

Takeda et al. fails to overcome the deficiencies noted above in Mortimer et al. Takeda et al. merely discloses a machine translation system and method for translating sentences from a first language to a second language. Takeda et al. does not disclose, teach or suggest an individualized learning method or an individualized learning system...wherein at least one modification is automatically categorized or manually categorized, as claimed in claims 32 and 44. Consequently, neither Mortimer et al. nor Takeda et al., alone or in combination, disclose, teach or suggest the subject matter recited in claims 32 and 44.

Therefore, Applicant respectfully submits that claims 41 and 53, which depend from respectively claims 32 and 44, are patentable over the combination of Mortimer et al. and Takeda et al. Thus, Applicant respectfully requests that the rejection of claims 41 and 53 under § 103(a) over the combination of Mortimer et al. and Takeda et al. be withdrawn.

New claims 56 and 57 recite, *inter-alia*, “translating/translated the at least one document from a first language into a second language.”

Claims 56 and 57 correspond to originally presented claims 41 and 53, respectively.

The Examiner concedes that Mortimer et al. does not disclose translating the at least one document from a first language into a second language. The Examiner contends, however, that Takeda et al. teaches translating from a first language into a second language and asserts that it would have been obvious to one of ordinary skill in the art to incorporate translating into the method and system of Mortimer et al. Applicant respectfully disagrees.

There is no suggestion or motivation in either Mortimer et al. or Takeda et al. to combine these two references. Mortimer et al. is concerned about a teaching system for keeping track of changes or modifications made to a teaching material while Takeda et al. is concerned about translating a document from a first language into a second language. Thus, one of ordinary skill in the art would not have been motivated to combine Takeda et al. and Mortimer et al. and incorporate the translating of Takeda et al. into the system of Mortimer et al. Consequently, neither Mortimer et al. nor Takeda et al., alone or in combination, disclose, teach or suggest the subject matter recited in claims 56 and 57.

Therefore, Applicant respectfully submits that claims 56 and 57 are patentable over the combination of Mortimer et al. and Takeda et al.

Claims 58-59 depend from either claim 32 or claim 44. Therefore, for at least the reasons provided above with respect to claims 32 and 44, Applicant respectfully submits that claims 58-59 are also patentable.

Claim 60 recites, *inter alia*, “storing a plurality of documents;...generating a modification to each of the plurality of documents...and generating a summary comprising the modification to each of the plurality of documents.”

Mortimer et al. discloses a note module which allows a student to insert personalized notes to a material on a page of a textbook (CITbook). Mortimer et al. also discloses a highlighting module which allows a student to highlight selected text within the material of the textbook (CITbook) which is permanently stored with the material of the textbook until unhighlighted (see Col. 17, lines 64-67 in Mortimer et al.). Mortimer further discloses an automated outlining feature which selectively extracts inserted and highlighted notes and generates an outline that is stored into a “notes file.” (see Col. 18, lines 1-3 in Mortimer et al.).

However, Mortimer et al. merely discloses modifying one textbook (CITbook), i.e., a single document. Mortimer et al. does not disclose, teach or even remotely suggest generating a modification to each of a plurality of documents. Furthermore, Mortimer et al. does not disclose, teach or suggest generating a summary comprising the modification to each of the plurality of documents. Indeed, as stated above, Mortimer et al. is merely using one text (one textbook), i.e. one document, and Mortimer et al. simply makes modifications to the one textbook CITbook (see abstract in Mortimer et al.) and generates an outline of the modifications to the single textbook.

Takeda et al. does not cure the deficiencies noted above in Mortimer et al. Therefore, neither Mortimer et al. nor Takeda et al., alone or in combination, disclose, teach or suggest the subject matter recited in claim 60.

Therefore, Applicant respectfully submits that claim 60 and claims 61-70 which depend therefrom, are patentable.

Furthermore, neither Mortimer et al. nor Takeda et al., alone or in combination, disclose, teach or suggest “the plurality of documents relate to a common subject matter,” as recited in claim 63. Moreover, neither Mortimer et al. nor Takeda et al. alone or in combination, disclose, teach or suggest “storing a plurality of other documents...said plurality of other documents comprising a different subject matter than a subject matter of the first mentioned plurality of documents,” as recited in claim 69.

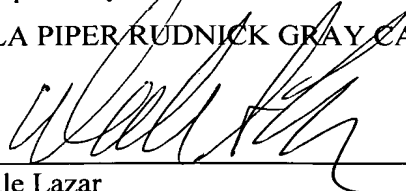
Therefore, for these additional reasons, Applicant respectfully submits that claims 63 and 69 are further patentable.

CONCLUSION

In view of the foregoing, Applicant submits that this application is now in condition for allowance. An early and favorable indication of same is kindly requested. If any point remains at issue, however, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

DLA PIPER RUDNICK GRAY CARY US LLP

A handwritten signature in black ink, appearing to read 'Dale Lazar', is written over a horizontal line.

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